

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
12 Cr. 134 (BMC-MDG)
UNITED STATES OF AMERICA :
 :
- against - :
IBRAHIM SULEIMAN ADNAN ADAM HARUN, :
 :
Defendant. :
 :
-----X

**DECLARATION IN SUPPORT
OF DEFENDANT IBRAHIM
SULEIMAN ADNAN ADAM
HARUN’S RESPONSE TO THE
GOVERNMENT’S CLASSIFIED
EX PARTE FILING PURSUANT
TO CIPA §4 AND RULE
16(d), FED.R.CRIM.P.**

JOSHUA L. DRATEL, pursuant to 28 U.S.C. §1746, hereby affirms under penalty of perjury:

1. I am a lawyer, and I represent defendant Ibrahim Suleiman Adnan Adam Harun in the above-captioned case. I make this Declaration in support of Mr. Harun’s motion in relation to the government’s submission pursuant to Section 4 of the Classified Information Procedures Act (“CIPA”), 18 U.S.C. App. 3 (2000), and Rule 16(d), Fed.R.Crim.P., respectfully requesting that the Court deny the government’s request to file its §4 application *ex parte*, and compel disclosure thereof to cleared defense counsel.

2. The legal bases for this motion are set forth in the accompanying Memorandum of Law. Also, as set forth therein, defense counsel request an *ex parte* conference with the Court at which counsel can present facts regarding the defense case that would be pertinent to the Court’s review of the §4 material submitted by the government.

3. Prior application for this relief has not been made.

WHEREFORE, it is respectfully requested that the Court grant Mr. Harun’s motion in its entirety, and for any such other and further relief as to this Court seems just and proper.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. 28 U.S.C. §1746. Executed December 14, 2015.

/s/
JOSHUA L. DRATEL